

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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In re:	)	
	)	Chapter 11
	)	
JOANN INC., <i>et al.</i> <sup>1</sup>	)	Case No. 25-10068 (CTG)
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	<b>Re: Docket Nos. 429 &amp; 929</b>

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**CERTIFICATION OF COUNSEL REGARDING FIFTH  
NOTICE OF ASSUMPTION AND ASSIGNMENT OF CERTAIN  
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

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The undersigned counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies as follows:

1. On May 16, 2025, the Debtors filed the *Fifth Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 929] (the “Fifth Assumption Notice”) regarding the assumption and assignment of certain unexpired leases set forth in the Fifth Assumption Notice (the “Original Assumption List”). Attached to the Fifth Assumption Notice was a proposed form of order (the “Assumption Order”) authorizing the assumption and assignment of the Original Assumption List.
2. The deadline to object to the Fifth Assumption Notice was May 30, 2025 (the “Objection Deadline”).

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. Prior to the Objection Deadline, Landlord for store number 2204, MP Elko LLC (“Elko”), provided informal comments to the Fifth Assumption Notice. Thereafter, Elko agreed to revise the proposed cure amounts listed in the Fifth Assumption Notice pursuant to an agreement between Elko and the proposed assignee, Dollar Tree Stores, Inc. (“Dollar Tree”).

4. Any leases subject to unresolved objections and informal comments received regarding the remaining balance of the leases included in the Fifth Assumption Notice (collectively, the “Outstanding Leases”) are not included in the Revised Assumption Order. For the avoidance of doubt, the Fifth Assumption Notice remains pending, and has not been withdrawn, with respect to the Outstanding Leases. To the extent that the Debtors and the relevant landlords reach agreement with respect to any Outstanding Lease, the Debtors will submit a proposed form of order with respect to such lease.

5. Attached hereto as Exhibit A is a revised proposed form of order (the “Revised Assumption Order”) assigning the Elko lease listed in the Fifth Assumption Notice to Dollar Tree. A redline comparing the Revised Assumption Order to the Assumption Order is attached hereto as Exhibit B.

6. The Revised Assumption Order has been shared with counsel to Elko and Dollar Tree, neither of whom object to entry of the Revised Assumption Order.

7. Accordingly, the Debtors request entry of the Revised Assumption Order attached hereto as Exhibit A at the Court’s earliest convenience.

*[Remainder of page left intentionally blank]*

Dated: June 27, 2025  
Wilmington, Delaware

*/s/ Elazar A. Kosman*

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